

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**Aubrey “Drake”
Graham,**

Plaintiff

v.

**UMG Recordings,
Inc.,**

Defendant

Case No. 25-00399

**MOTION OF JOSEPH ANTHONY REYNA FOR LEAVE TO FILE BRIEF AS AMICUS
CURIAE IN SUPPORT OF NEITHER PARTY**

INTRODUCTION

Pursuant to the Court’s inherent authority and Federal Rule of Appellate Procedure 29, I respectfully submit this motion for leave to file an Amicus Curiae brief in support of neither party in the above-captioned matter.

My name is **Joseph Anthony Reyna**, and I appear **pro se** as the founder of **Dreams Over Dollars™**, a Texas-based public interest nonprofit. My work is focused on legal documentation of economic suppression, digital gatekeeping, and structural artist disenfranchisement in the music and platform economy.

INTEREST OF THE AMICUS CURIAE

As a nonprofit founder, music professional, and documented whistleblower, I have spent the last decade submitting federal filings, FOIA requests, and economic loss documentation relating to systemic harm against independent artists—including whistleblower submissions to the IRS, SEC, FTC, FCC, DOJ, and multiple state attorneys general.

My nonprofit's mission is to **restore transparency and economic equity within creative ecosystems**, particularly where algorithmic suppression and platform-linked financial incentives distort visibility and fairness.

My direct experience with federal agency silence, documented retaliation, and evidence-based structural analysis gives me a unique position to inform the Court about broader systemic concerns—including those not directly addressed by the Plaintiff or Defendant—that are nonetheless highly relevant to the legal and public-interest context of this case.

REASONS TO GRANT LEAVE TO FILE

The submitted brief does not duplicate any party's arguments. Rather, it presents **evidentiary, historical, and structural documentation** critical to understanding the systemic context in which this litigation now resides. This includes:

- Whistleblower filings under 26 U.S.C. § 7623(b)
- FOIA responses and denials across multiple federal entities
- Public record evidence of algorithmic payola, metadata suppression, and suppressed royalties
- Historical continuity between contemporary suppression and legacy artist exploitation

This brief seeks not to expand the case, but to **preserve the record** in a way that promotes judicial efficiency and future clarity—without disturbing the Court's adjudication of the parties' claims.

CERTIFICATION OF INDEPENDENCE

I hereby certify that this brief is submitted entirely **independently**, without funding, support, or coordination from any party in this case. I am not aligned with the Plaintiff, Defendant, or their counsel, nor do I seek outcome-based involvement. My role is solely as an **independent memory holder**, filing to preserve systemic truth on behalf of the public and creative communities affected by this matter.

CONCLUSION

For the foregoing reasons, I respectfully ask the Court to grant leave to file the attached **Amicus Curiae Brief in support of neither party**, and to consider it as part of the Court's preserved record in this matter.

Respectfully Submitted,

Joseph Anthony Reyna
Pro Se Amicus Curiae
Founder, Dreams Over Dollars™
5900 Balcones Dr. #16077
Austin, TX 78731
WhiteHat@JoeCattt.com | (956) 202-5580

Dated: April 7, 2025

CERTIFICATE OF SERVICE

I hereby certify that on April 7th, a true and correct copy of the foregoing Motion for Leave to File Amicus Curiae Brief and the attached brief were served upon counsel for the Plaintiff and Defendant via certified mail and/or email:

- **Plaintiff's Counsel:**
Michael J. Gottlieb
Willkie Farr & Gallagher LLP
1875 K Street, NW
Washington, DC 20006
- **Defendant's Counsel:**
Sidley Austin LLP
787 Seventh Avenue
New York, NY 10019

Copies were also provided to the Court under sealed cover with accompanying materials, including supporting documentation and sworn affidavits, previously submitted.